# **EXHIBIT A**

----- Forwarded message ------

From: **Joe Earley** <joe@josephearley.com> Date: Sun, Feb 16, 2020 at 10:01 AM

Subject: Re: PG&E Lawsuit - February 14th Weekly Update

To: debbie pool < hebearshebear@att.net >

You may want to learn more about what the negotiations entailed and what the economic realities are. Mikal Watts will discuss all this again in March. This was not entered into lightly and I assure you any attorneys who oppose it was not involved in the negotiations. We wouldn't be recommending it if there was a better feasible plan.

On Sat, Feb 15, 2020 at 8:47 AM debbie pool < hebearshebear@att.net > wrote:

In response:

I do not think this plan is the best deal nor in our best interests of survivors.

We should be fighting for all cash while giving the stock value to the insurance companies. Opposition should have been made from the very beginning about the disparity between what was offered to survivors in contrast to what was offered insurance reimbursement.

I understand that distribution will not be equal; some will receive more and some less. I also understand that not every claim is valid. However, as it stands, the primary payment will be peanuts after paying attorneys fees and then we will have to wait another year to receive another payment, and another year for final payment.

There is absolutely no guarantee that PG\$E stock will remain stable enough to fund the trust, it's too volatile.

I expected to relocate and buy a house outright with this settlement, but there is no way this will happen on a multiple payment option.

I will vote NO to this deal as it stands.

If you truly believe this is the best deal and are seeking a cram down, then I feel doubt in proper representation.

There are other attorneys who agree this is a bad deal.

Now that survivors are learning just what this deal entails, I am witnessing disgruntled opposition far and wide.

Thank you for reading

Debbie

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On Feb 14, 2020, at 1:52 PM, Joe Earley < joe@josephearley.com > wrote:

#### Dear Clients:

Here's another reminder of the procedure for claiming our lost personal possessions (or "contents"). A lot of folks are confused about how insurance affects our claims. Remember the overall rule: *You cannot be paid more than once for the same damages.* So, if you have received insurance money for lost contents, your PG&E recovery for lost contents will need to be reduced by the amount you've already received. This is why we will need a very comprehensive list of all lost items. That list will be evaluated for a total loss amount. Normally that total value will greatly exceed what you were paid by insurance for your lost contents. Because the rules governing the claims process are not yet established, we are waiting to advise on how to specifically set up your contents claim, *but we do know that to maximize your claim you will need a complete list. So there is no reason to hesitate getting that process started.* 

It is also fairly certain that there will be a procedure available for those who are unable to create a complete list. That procedure will involve some sort of formula based on the square footage of living space in your former home as well as some other factors. What is also fairly certain is that the recovery using that process will be less than if a complete list is created. But there are many reasons why it may be difficult or impossible to list everything out and we will respect that decision.

#### Bankruptcy Update

As you have likely heard, the new restructuring plan has been filed and is available to be read. You can read the plan <u>HERE</u>. As we have told you in our client update meetings, this plan is the result of months of very tough negotiations. In the end, we believe this is a good plan, which deserves our support and approval. The sooner the plan is approved, the faster PG&E can exit bankruptcy and the quicker we will recover for our losses.

We know you will have many questions about the restructuring plan. That is why we will hold an additional client update meeting on March 21. As usual, Mikal Watts will be available to answer all of your questions. So, please mark your calendar and try

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to attend this meeting, we really want to make sure that you understand the important elements of the restructuring agreement. Of course it will be recorded so you can watch it later through a link.

FEMA has filed its response to our (TCC) objection to its claim to our settlement fund. There was nothing really unexpected and the issue will be decided soon either by settlement or after the bankruptcy judge holds a hearing to determine the issue. We are still optimistic about the ultimate result.

Finally, the TCC has formally objected to Feather River Hospital's (Adventist Health Systems/West) claim against our settlement funds. They are making a substantial claim (billions of dollars) but our objection demonstrates it is a weak claim overall. We shall see...

### Rebuilding Issues

#### **Fire Recovery Meeting**

Thursday, February 20, 2020 7:00PM-8:00PM

Historic Schoolhouse 11666 Concow Road, Concow.

Topics will include: Tree Removal Program; Taxes; Concow Hazardous Fuel Removal-Crain Ridge Project; Concow Hazardous Fuel Removal-Granite Ridge Project; Identify needs and Resources.

Refreshments will be provided

For information, contact Brenda Rightmyer 530.534.4179

Thinking about rebuilding? Rebuild Paradise, Paradise Chamber of Commerce, Butte College, Paradise Realtors Association, Chico Builders Association, and Valley Contractors Exchange invite you to join them Friday, February 28th from 3-6 pm at the Paradise Alliance Church for the Home Builders Resource Connection. This is a special opportunity to connect with local agencies, realtors, architects, general contractors, lenders, insurance agents and more. This event is free to the public, so please come join! The address of the event is 6491 Clark Rd Paradise, Ca.

Rebuild Advocates are available at the BRC to residents of the Town of

Paradise and Butte County to help navigate the process of rebuilding and be on hand to help guide people through the rebuilding process. They can also help guide residents through the financial resources available to make rebuilding more affordable such as help people apply for loans and connect with contractors. You may call 530-872-6291 ext. 130 to schedule an appointment. Please reach out, they are here for you.

The Building Resiliency Center (BRC) is open. The BRC will help further our goal of getting our residents back home as soon as possible. The BRC is located at 6295 Skyway and is open from 8 am to 5 pm Monday through Friday.

The BRC will be a one-stop-shop for residents who are rebuilding or even considering rebuilding in Paradise. The Town of Paradise Building Department is relocating to the BRC to offer residents a better experience as our community rebuilds. There is more space, seating areas, and more permit technicians to help speed up the process.

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As always, if you have any questions or concerns, please call (530) 413-8151 or email me.

Joe
--On Behalf of...

Law Office of Joseph Earley
Watts Guerra LLP

Mauro Archer O'Neill LLC

Law Office of Douglas Boxer

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# JOSEPH M. EARLEY III Law Offices of Joseph M. Earley III Paradise, California 530-876-1111

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